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25 **UNITED STATES BANKRUPTCY COURT**
26 **NORTHERN DISTRICT OF CALIFORNIA**
27 **SAN FRANCISCO DIVISION**

28 In re: _____) Case No. 19-30088 (DM)

29 PG&E CORPORATION,) Chapter 11

30 - and -) (Lead Case)

31 PACIFIC GAS & ELECTRIC) (Jointly Administered)

32 COMPANY,)

33 Debtors.)

34) □ Affects PG&E Corporation

35) □ Affects Pacific Gas & Electric Company

36) ☒ Affects both Debtors

37 **NOTICE OF APPEARANCE AND**
38 **REQUEST FOR NOTICE AND**
39 **SERVICE OF PAPERS**

40 **All papers shall be filed in the Lead Case,*

41 *No. 19-30088 (DM)*

1 PLEASE TAKE NOTICE that creditor Liberty Mutual Insurance Company, and its related
2 entities, (collectively, “*Liberty*”), by and through its counsel, Choate, Hall & Stewart LLP and
3 Cozen O’Connor, hereby files this *Notice of Appearance and Request for Notice and Service of*
4 *Papers* pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure.

5 PLEASE TAKE FURTHER NOTICE that Liberty hereby requests that counsel listed
6 below be added to the official mailing matrix, CM/ECF, and service lists for these cases; and that
7 all notices given or required to be given in this proceeding and all papers served or required to be
8 served in this proceeding, be given and served upon:

9
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29 PLEASE TAKE FURTHER NOTICE that this request for notice and service includes
30 copies of all papers, including, but not limited to, reports, pleadings, motions, applications or
31 petitions, schedules, plans, disclosure statements, and answering or reply papers, orders, demands
32 (formal or informal) written or oral and whether conveyed by mail, telephone, courier service, hand
33 delivery, facsimile transmission, electronic mail, telex or otherwise filed in these proceedings or
34 any related adversary proceedings and that such service be by mailing one copy of each, unless
35 otherwise directed by the Court, to the parties listed above.

1 **PLEASE TAKE FURTHER NOTICE** that Liberty does not, by filing this *Notice of*
2 *Appearance and Request for Notice and Service of Papers*, nor any subsequent appearance,
3 pleading, claim or suit, submit to the jurisdiction of the Bankruptcy Court or intend that this *Notice*
4 *of Appearance and Request for Notice and Service of Papers* constitute a waiver of any of their
5 rights: (i) to have final orders in non-core matters entered only after *de novo* review by a District
6 Judge; (ii) to trial by jury in any proceeding so triable in these cases, or any controversy or
7 proceeding related to these cases; (iii) to have the District Court withdraw the reference in any
8 matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions,
9 defenses, setoffs or recoupments to which it may be entitled, which it expressly reserves.

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13 Dated: May 17, 2019

14 Respectfully submitted,

15 **COZEN O'CONNOR**

16 /s/ Fulton M. Smith III

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